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Federal Communications Commission  
Office of the Secretary

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November 9, 2007

Ex Parte

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

ORIGINAL

Re: Petitions of the Verizon Telephone Companies for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence and Virginia Beach Metropolitan Statistical Areas, WC Docket No. 06-172

Dear Ms. Dortch:

On November 8, 2007, Dee May, Ed Shakin, Scott Randolph, and Sherry Ingram of Verizon and Evan Leo of Kellogg, Huber, Hansen, Todd, Evans and Figel on behalf of Verizon met with Dana Shaffer, Marcus Maher, Nick Alexander, Jeremy Miller and Don Stockdale of the Wireline Competition Bureau to discuss the above captioned matter.

Verizon reviewed the extensive information it has provided in the record demonstrating that in each of the six MSAs there is significant competition from cable companies, who have ubiquitous networks they are using to provide services to residential and business customers alike. In addition, there is a wide range of other intermodal competitors - such as wireless, fixed wireless, and over-the-top providers who provide a significant and growing alternative to both business and residential consumers. Verizon also submitted a detailed analysis of the data the Commission relied upon in granting a similar forbearance request from Qwest in Omaha, NE and the corresponding location of supporting data submitted in Verizon's filings. The attached material was used in the discussions.

These attachments contain Highly Confidential Information. Highly Confidential Information has been marked "HIGHLY CONFIDENTIAL - SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET 06-172 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION" in accordance with the Second Protective Order in these proceedings.

Please let me know if you have any questions.

Sincerely,

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REDACTED - FOR PUBLIC INSPECTION

**Attachments**

**cc: Nick Alexander  
Marcus Maher  
Dana Shaffer  
Don Stockdale**

# ***Verizon Petitions for Forbearance***

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**Public Version**



***November 8, 2007***

# ***Verizon Petitions for Forbearance***



- ♦ **In *Omaha* and *Anchorage*, the Commission applied different tests in granting forbearance from dominant carrier regulation and for unbundling.**
- ♦ **Mass Market - Dominant Carrier Regulation**
  - MSA-wide relief.
  - Relied on the growth in cable's residential access line base and corresponding decline in Qwest's base.
  - Relief granted from price cap, tariff filing, and service discontinuance rules as applied to switched access services for the entire MSA.
- ♦ **Section 251(c) Unbundling Rules**
  - Wire center level relief.
  - Relied on data provided by the cable company as to the percentage of customers it could reach in the ILEC wire center.
  - Relief granted from loop and transport unbundling in selected wire centers where cable's plant covered a certain percentage of end users in a wire center.

# ***Verizon Petitions for Forbearance***



## **◆ Scope of Relief Requested**

- Consistent with relief granted to Qwest in Omaha and ACS in Anchorage
  - Dominant Carrier Regulation for Switched Access Services
    - Price cap and tariff filing requirements.
    - Service discontinuance rules.
  - Obligation to unbundle DS0, DS1 and DS3 loops and transport under Section 251.
- *Computer Inquiry* rules

## **◆ Relief Sought in Six MSAs:**

- Boston, New York, Philadelphia, Pittsburgh, Providence, and Virginia Beach

## ***Forbearance is Warranted***



- ♦ The FCC has held (as the Courts have ruled) that the Section 251 unbundling authority should be used in a targeted manner only in those situations where carriers genuinely are impaired and where unbundling does not frustrate sustainable, facilities-based competition. (*TRRO* at 2)
- ♦ The FCC has encouraged ILECs to seek forbearance from the unbundling rules in specific geographic markets where they believe the aims of section 251(c)(3) have been “fully implemented” and the other requirements for forbearance have been met. (*TRRO* at 39)
- ♦ In both Omaha and Anchorage, the FCC found that significant competition from the incumbent cable operators warranted forbearance from its unbundling rules.

## ***Forbearance is Warranted***



- ♦ In the six Verizon MSAs, competition is more advanced than it was in Omaha with respect to both mass-market and enterprise customers.
- ♦ In the two years since the Omaha decision, cable's penetration into the residential and business telephony markets have increased significantly.
- ♦ As in Omaha and Anchorage, cable is fully entrenched throughout each of the six MSAs and has made substantial inroads into Verizon's local exchange businesses.
- ♦ However, in addition to cable, Verizon has shown that it faces ubiquitous competition from a wide range of technologies and an even broader array of providers; wireless, VoIP, CLECs, and competitive wholesale service providers.

# ***Competition is Extensive***



## ♦ **Cable:**

- Cable operators offer competitive voice services to the vast majority of the homes in each of the MSAs—from 65-80% of the homes in the Pittsburgh MSA to over 90% in the Virginia Beach MSA.

## ♦ **Wireless:**

- Wireless services are widely available from multiple providers throughout each of the six MSAs, offering calling packages that compete with Verizon's service for comparable offerings.

## ♦ **VoIP**

- Several dozen VoIP providers offer services in these MSAs that are comparable in features and price to Verizon's and are available to any customer with a broadband connection.

## ♦ **Wholesale Alternatives:**

- CLECs use Wholesale Advantage (UNE-P replacement) and resale products to service residential customers in each MSA.

## ♦ **Enterprise Competition:**

- The number of business lines served by competing carriers using their own facilities, including cable, is increasing dramatically.



## ***Competitive Showings***



- ♦ The total number of Verizon switched access lines in all of these MSAs have declined significantly from 2000 – 2006, and have declined from the time the petitions were first filed.

**[REDACTED FOR PUBLIC INSPECTION]**

## ***Competitive Showings***



- ♦ When compared to historical trends, based on average growth for 1995-1999 (per FCC statistics), the losses are even greater.

**[REDACTED FOR PUBLIC INSPECTION]**

## ***Competitive Showings***

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- ♦ In each of the six MSAs, one or more of the major incumbent cable operators continues to serve the vast majority of the homes in the MSA

**[REDACTED FOR PUBLIC INSPECTION]**

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## ***Competitive Showings***

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- ◆ There also is robust competition for business customers in these six MSAs from cable, IXC's, CLECs, other ILECs, systems integrators, and equipment vendors.

**[REDACTED FOR PUBLIC INSPECTION]**

## ***Competitive Showings***



- ♦ **The major cable operators continue to move aggressively into the enterprise market.**
  - Cablevision has “more than 2,700 miles of fiber optic cable (nearly 113,000 miles of actual fiber).” Cablevision announced in January 2007, it had connected its 2000th lit building in the New York metropolitan area and was extending its network “to businesses located outside Manhattan.” Cablevision has “identified over 600,000 businesses inside our footprint that we passed with cable that were serviceable today.”
  - Comcast, the largest cable provider in Boston, Philadelphia, and Pittsburgh has stated that commercial services represent the “next great business opportunity”, that it will do the “same thing” in the enterprise market as it has done in the mass market, and that this business is going to ramp up very substantially since its “existing footprint goes against many, many small and medium-sized businesses.”
  - RCN states its network includes “over 9500 route miles of fiber optic and coaxial cable in ... Boston, New York City, Philadelphia, Washington D.C. and Chicago.” This includes MSAs representing nearly 50 percent of Verizon’s DS1 and DS3 special access revenue.
  - Cox, the largest operator in Providence and Va. Beach, “ended the [first quarter of 2007] with more than 187,000 commercial customers, reflecting 32.2% year-over-year growth.

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## ***Competitive Showings***



- ◆ **Competitive carriers have deployed extensive fiber facilities in these MSAs.**

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## ***Competition Will Continue to Thrive***



- ◆ **Verizon has a successful track record in providing wholesale alternatives to competitive carriers where regulation has been lifted.**
  - Over 150 Wholesale Advantage (UNE-P replacement) agreements.
  - Numerous commercial agreements for line sharing and dark fiber.
  - Successfully worked with CLECs to convert circuits to discounted special access plans in non-impaired wire centers as a result of the TRRO decision.
  - Over 200 customers on commercial agreements for enterprise broadband services.

## ***Competition Will Continue to Thrive***



- While a select few CLECs have chosen a business model based on the use of UNEs, the majority use special access and other wholesale offerings.

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## ***Competition Will Continue to Thrive***



- ◆ The majority of DS0 circuits in the six MSAs are provisioned as Wholesale Advantage (UNE-P replacement) arrangements and not as UNEs.
- ◆ The bulk of DS0 UNE loops in each MSA is concentrated among a handful of carriers that have chosen a business model based on the use of UNEs.

<b><u>OMAHA ORDER</u></b>	<b><u>VERIZON FORBEARANCE PETITIONS</u></b>
<b><u>Evidence Relied Upon in <i>Omaha</i> to Support Relief From Dominant Carrier Regulations</u></b>	<b><u>Evidence Verizon Submitted To Support Relief from Dominant Carrier Regulation</u></b>
FCC concluded that "growth in Cox's residential access line base and corresponding decline in Qwest's base supports forbearance," from dominant carrier regulation for mass market services. Omaha ¶ 33. And "the number of resold lines and QPP lines is not insignificant." Omaha ¶ 36.	Evidence demonstrates growth in cable residential access line base and corresponding decline in Verizon's access line base supports forbearance.
Data from Qwest and Cox identifying number of residential access lines. Omaha ¶ 25, 28.	<p>(1) Verizon's retail residential switched access lines by wire center. Reply Declaration ¶ 10, Table 3, Exhibit 2.</p> <p>(2) Competitive residential switched access lines by wire center. Reply Declaration, Exhibit 1</p> <p>(3) Cable residential E911 listings by wire center. Reply Declaration ¶ 11, Table 6, Exhibit 3.</p> <p>(4) Carrier specific E911 data by wire center for cable companies and selected carriers. Reply Declaration ¶¶ 35-49, Exhibit 3.</p> <p>(5) Percentage of wire centers with cable residential E911 listings. Reply Declaration ¶ 11, Table 4.</p> <p>(6) Percentage of Verizon's residential access lines in wire centers with cable residential E911 listings. Reply Declaration ¶ 11, Table 6.</p>
E911 data showing competitive LEC market share of residential access lines. Omaha ¶ 29.	<p>(1) E911 data showing competitive LEC access lines by wire center. Reply Declaration, Exhibit 1.</p> <p>(2) Carrier specific E911 data by wire center for cable companies and selected carriers. Reply Declaration ¶¶ 35-49, Exhibit 3.</p>

	(3) Data showing Verizon's share of mass market connections when all competitive alternatives are considered. Reply Declaration ¶ 13, Figure 1.
Data showing decline in Qwest retail access line base. Omaha fn. 79.	Data showing decline in Verizon's residential and business switched access lines. Reply Declaration ¶ 10, Tables 1 and 2.
Data reflecting number of QPP residential lines, resold residential lines, and UNE-P residential lines. Omaha fn. 95.	Data reflecting by wire center Verizon Wholesale Advantage (QPP equivalent), resold residential and business lines, and UNE loops. Reply Declaration ¶ 51, Exhibit 4.
Data showing Cox and others were competing. Omaha ¶ 38, fn. 101 & 102.	<p>(1) Web shots and recent statements of competitive providers that they are competing successfully. Declaration of Quintin Lew et. al. ("Lew Declaration"), Exhibit 7; Reply Declaration, Exhibit 11; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment I and Attachment I (Supplement).</p> <p>(2) Data comparing competitor calling bundle prices and features for mass market services. Lew Declaration, Exhibit 1.</p> <p>(3) Data identifying Over-the-Top VoIP providers offering local telephone numbers by MSA. Lew Declaration, Exhibit 2.</p> <p>(4) Data showing by wire center competitor collocation. Reply Declaration, Exhibit 9.</p> <p>(5) Data identifying carriers that have deployed known fiber transport facilities and quantifying fiber route miles. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 1.</p> <p>(6) Data identifying competitors that have lit buildings and quantifying the number of known competitor lit buildings. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 2.</p>

	<p>(7) Data identifying a number of carriers who compete successfully using Verizon's special access services. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 3.</p> <p>(8) Data showing that competitors use predominately special access service and other wholesale alternatives instead of UNEs to compete. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 10 Supplement.</p> <p>(9) Maps showing cable franchise and wireless serving areas by MSA. Lew Declaration, Exhibits 3-4.</p> <p>(10) Maps identifying known competitive fiber providers, known competitive fiber and known competitor lit buildings, and competitors competing using special access. Lew Declaration, Exhibits 5, 8; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment H.</p>
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<b><u>Evidence Relied Upon in <i>Omaha</i> to Support Relief From Unbundling Obligations.</u></b>	<b><u>Evidence Verizon Submitted To Support Relief From Unbundling Obligations.</u></b>
Data showing decline in Qwest retail access line base. Omaha fn. 79.	Data showing decline in Verizon's residential and business switched access lines. Reply Declaration ¶ 10, and Tables 1 and 2.
E911 data, LEC resale, and UNE-P data showing competitive LEC market share of residential access lines, and business voice grade equivalent lines. Omaha ¶ 58, fn. 152.	<p>(1) E911 data showing competitive LEC access lines by wire center. Reply Declaration, Exhibit 1.</p> <p>(2) Carrier specific E911 data by wire center for cable companies and selected carriers. Reply Declaration ¶¶ 35-49, Exhibit 3.</p> <p>(3) Data showing Verizon's share of mass market connections when all competitive alternatives are considered. Reply Declaration ¶ 13, Figure 1.</p>

	<p>(4) Cable residential E911 listings by wire center. Reply Declaration ¶ 11, Table 6, Exhibit 3.</p> <p>(5) Percentage of wire centers with cable residential E911 listings. Reply Declaration ¶ 11, Table 4.</p> <p>(6) Percentage of Verizon's residential access lines in wire centers with cable residential E911 listings. Reply Declaration ¶ 11, Table 5.</p> <p>(7) Competitive business E911 listings. Lew Reply Declaration ¶ 16, Table 9</p> <p>(8) Percentage of wire centers with competitive business E911 listings. Reply Declaration ¶ 16, Table 7.</p> <p>(9) Percentage of Verizon's business access lines in wire centers with competitive business E911 listings. Lew Reply Declaration, ¶ 16, Table 8.</p> <p>(10) Data reflecting by wire center Verizon Wholesale Advantage (QPP equivalent) and resold residential lines and wholesale switched access lines. Reply Declaration ¶ 51, Exhibit 4.</p>
<p>Data from Cox showing by wire center the percent of end user locations Cox's networks "covers" – i.e. where Cox "uses its own network ... through which it is willing and able, within a commercially reasonable time, to offer the full range of services that are substitutes for the incumbent LEC's local service offerings." Omaha ¶ 60, fns. 155, 156.</p>	<p>The FCC has requested this data from cable companies operating in the relevant MSAs. In addition Verizon has submitting the following supporting data:</p> <p>(1) E911 data showing competitive LEC access lines by wire center. Reply Declaration, Exhibit 1.</p> <p>(2) Carrier specific E911 data by wire center for cable companies and selected carriers. Reply Declaration ¶¶ 35-49, Exhibit 3.</p> <p>(3) Cable residential E911 listings. Reply Declaration ¶ 11, Table 6, Exhibit 3.</p>

	<p>(4) Percentage of wire centers with cable residential E911 listings. Reply Declaration ¶ 11, Table 4.</p> <p>(5) Percentage of Verizon's residential access lines in wire centers with cable residential E911 listings. Reply Declaration ¶ 11, Table 5.</p> <p>(6) Web shots and recent statements of competitive providers that they are competing successfully. Declaration of Quintin Lew et. al. ("Lew Declaration"), Exhibit 7; Reply Declaration, Exhibit 11; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment I and Attachment I (Supplement).</p> <p>(7) Data identifying carriers that have deployed known fiber transport facilities and quantifying fiber route miles. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 1.</p> <p>(8) Data identifying competitors that have lit buildings and quantifying the number of known competitor lit buildings. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 2.</p> <p>(9) Maps showing cable franchise serving areas by MSA. Lew Declaration, Exhibit 3.</p> <p>(10) Maps identifying known competitive fiber providers, known competitive fiber and known competitor lit buildings, and competitors competing using special access. Lew Declaration, Exhibits 5, 8; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment H.</p>
Letter/data from Cox indicating that it provides service without relying upon Qwest facilities. Omaha ¶ 64, fn. 167.	<p>The FCC has requested this data from cable companies operating in the relevant MSAs. In addition Verizon has submitting the following supporting data demonstrating that cable companies and other competitors compete using their own facilities:</p> <p>(1) Carrier specific E911 data by wire center for</p>

	<p>cable companies and selected carriers. Reply Declaration ¶¶ 35-49, Exhibit 3.</p> <p>(2) Cable residential E911 listings. Reply Declaration ¶ 11, Table 6, Exhibit 3.</p> <p>(3) Web shots and recent statements of competitive providers that they are competing successfully. Declaration of Quintin Lew et. al. ("Lew Declaration"), Exhibit 7; Reply Declaration, Exhibit 11; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment I and Attachment I (Supplement).</p> <p>(4) Data identifying carriers that have deployed known fiber transport facilities and quantifying fiber route miles. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 1.</p> <p>(5) Data identifying competitors that have lit buildings and quantifying the number of known competitor lit buildings. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 2.</p>
<p>Letter from Cox stating Cox is capable of delivering both mass market and enterprise telecommunications services, including service up to the OCn level to enterprise customers. Omaha ¶ 66, fn. 171.</p>	<p>The FCC has requested this data from cable companies operating in the relevant MSAs. In addition Verizon has submitting the following supporting data demonstrating that cable companies and other competitors are capable of delivering both mass market and enterprise services at capacities up to the OCn level.</p> <p>(1) Web shots and recent statements of competitive providers that they are competing successfully and providing services at all capacity levels. Declaration of Quintin Lew et. al. ("Lew Declaration"), Exhibit 7; Reply Declaration, Exhibit 11; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment I and Attachment I (Supplement).</p> <p>(2) Data comparing competitor calling bundle prices and features for mass market services. Lew Declaration, Exhibit 1.</p>

	<p>(3) Data identifying Over-the-Top VoIP providers offering local telephone numbers by MSA. Lew Declaration, Exhibit 2.</p> <p>(4) Data showing by wire center competitor collocation. Reply Declaration, Exhibit 9.</p> <p>(5) Data identifying carriers that have deployed known fiber transport facilities and quantifying fiber route miles. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 1.</p> <p>(6) Data identifying competitors that have lit buildings and quantifying the number of known competitor lit buildings. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 2.</p> <p>(10) Maps identifying known competitive fiber providers, known competitive fiber and known competitor lit buildings. Lew Declaration, Exhibits 5; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment H</p>
<p>Evidence that Cox markets itself to enterprise customers and has attracted enterprise customers. Omaha ¶ 66, fn. 173.</p>	<p>The FCC has requested this data from cable companies operating in the relevant MSAs. In addition Verizon has submitting the following supporting data demonstrating that cable companies and other competitors are marketing to enterprise customers and have attracted enterprise customers.</p> <p>(1) Web shots and recent statements of competitive providers offering enterprise services and stating that they are competing for and winning this business. Declaration of Quintin Lew et. al. ("Lew Declaration"), Exhibit 7; Reply Declaration, Exhibit 11; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment I and Attachment I (Supplement).</p> <p>(2) Data showing decline in Verizon's residential and business switched access lines. Reply Declaration ¶ 10, Tables 1 and 2.</p>



	<p>(3) Competitive business E911 listings. Low Reply Declaration ¶ 16, Table 9</p> <p>(4) Percentage of wire centers with competitive business E911 listings. Reply Declaration ¶16, Table 7.</p> <p>(5) Percentage of Verizon's business access lines in wire centers with competitive business E911 listings. Low Reply Declaration, ¶ 16, Table 8.</p> <p>(6) Data identifying competitors that have lit buildings and quantifying the number of known competitor lit buildings. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 2.</p> <p>(7) Data reflecting by wire center Verizon Wholesale Advantage (QPP equivalent), resold residential and business lines, and UNE loops. Reply Declaration ¶ 51, Exhibit 4.</p> <p>(8) Data identifying a number of carriers who compete successfully using Verizon's special access services. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 3.</p> <p>(9) Data showing that competitors use predominately special access service and other wholesale alternatives instead of UNEs to compete. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 10 Supplement.</p>
Letter from Cox indicating in each of 9 wire centers the percentage of business locations it can reach over its own facilities. Omaha ¶ 66, fn. 174.	The FCC has requested this data from cable companies operating in the relevant MSAs. In addition Verizon has submitting the following supporting data demonstrating that cable companies and other competitors are marketing to enterprise customers and have attracted enterprise customers.

	<p>(1) Web shots and recent statements of competitive providers offering enterprise services and stating that they are competing for and winning this business. Declaration of Quintin Lew et. al. ("Lew Declaration"), Exhibit 7; Reply Declaration, Exhibit 11; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment I and Attachment I (Supplement).</p> <p>(2) Data showing decline in Verizon's residential and business switched access lines. Reply Declaration ¶ 10, Tables 1 and 2.</p> <p>(3) Competitive business E911 listings. Lew Reply Declaration ¶ 16, Table 9</p> <p>(4) Percentage of wire centers with competitive business E911 listings. Reply Declaration ¶16, Table 7.</p> <p>(5) Percentage of Verizon's business access lines in wire centers with competitive business E911 listings. Lew Reply Declaration, ¶ 16, Table 8.</p> <p>(6) Data identifying competitors that have lit buildings and quantifying the number of known competitor lit buildings. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 2.</p> <p>(7) Data reflecting by wire center Verizon Wholesale Advantage (QPP equivalent), resold residential and business lines, and UNE loops. Reply Declaration ¶ 51, Exhibit 4.</p> <p>(8) Data identifying a number of carriers who compete successfully using Verizon's special access services. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 3.</p> <p>(9) Data showing that competitors use predominately special access service and other wholesale alternatives instead of UNEs to</p>
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	<p>compete. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 10 Supplement.</p>
<p>Maps and other evidenced indicating competitors have deployed transport facilities within the boundaries of the 9 wire centers. Omaha ¶ 66, fn. 175.</p>	<p>(1) Maps identifying known competitive fiber providers, known competitive fiber and known competitor lit buildings, by wire center. Lew Declaration, Exhibits 5; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment H.</p> <p>(2) Web shots and recent statements of competitive providers that they have deployed extensive facilities and are competing successfully. Declaration of Quintin Lew et. al. ("Lew Declaration"), Exhibit 7; Reply Declaration, Exhibit 11; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment I and Attachment I (Supplement).</p> <p>(3) Data showing by wire center competitor collocation. Reply Declaration, Exhibit 9.</p> <p>(4) Data identifying carriers that have deployed known fiber transport facilities and quantifying fiber route miles. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 1.</p> <p>(5) Data identifying competitors that have lit buildings and quantifying the number of known competitor lit buildings. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 2.</p>
<p>Data showing number of residential QPP arrangements and resale arrangements and business QPP and resale arrangements in 9 wire centers where relief granted. Omaha ¶¶ 67-68.</p>	<p>(1) Data reflecting by wire center Verizon Wholesale Advantage (QPP equivalent), resold residential and business lines, and UNE loops. Reply Declaration ¶ 51, Exhibit 4.</p>
<p>Data showing the number of special access DS1s and DS3s competitors use in the 9 wire centers. Omaha ¶ 68.</p>	<p>(1) Data identifying a number of carriers who compete successfully using Verizon's special access services. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 3.</p>

	<p>(2) Data showing that competitors use predominately special access service and other wholesale alternatives instead of UNEs to compete. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 10 Supplement.</p> <p>(3) Special access DS1 and DS3 lines by wire center, Reply Declaration, Exhibits 5 and 6.</p>
Data showing number of DS0, DS1, and DS3 UNE loops. Omaha ¶ 68.	<p>(1) Data showing that competitors use predominately special access service and other wholesale alternatives instead of UNEs to compete, number of DS0, DS1 and DS3 UNE loops. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 10 Supplement.</p> <p>(2) DS0, DS1 and DS3 UNE loops by wire center, Reply Declaration, Exhibit 4.</p>
Data from Cox showing by wire center number of residential access lines, DS0 loops to business customers, DS1 loops, DS3 loops, OCn loops, and the percentage of business locations covered. Omaha ¶ 69, fn. 188.	<p>The FCC has requested this data from cable companies operating in the relevant MSAs. In addition Verizon has submitting the following supporting data:</p> <p>(1) E911 data showing competitive LEC access lines by wire center. Reply Declaration, Exhibit 1.</p> <p>(2) Carrier specific E911 data by wire center for cable companies and selected carriers. Reply Declaration ¶¶ 35-49, Exhibit 3.</p> <p>(3) Cable residential E911 listings. Reply Declaration ¶ 11, Table 6, Exhibit 3.</p> <p>(4) Percentage of wire centers with cable residential E911 listings. Reply Declaration ¶ 11, Table 4.</p> <p>(5) Percentage of Verizon's residential access lines in wire centers with cable residential E911</p>

	<p>listings. Reply Declaration ¶ 11, Table 5.</p> <p>(6) Web shots and recent statements of competitive providers that they are competing successfully. Declaration of Quintin Lew et. al. ("Lew Declaration"), Exhibit 7; Reply Declaration, Exhibit 11; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment I and Attachment I (Supplement).</p> <p>(7) Data identifying carriers that have deployed known fiber transport facilities and quantifying fiber route miles. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 1.</p> <p>(8) Data identifying competitors that have lit buildings and quantifying the number of known competitor lit buildings. October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Exhibit 2.</p> <p>(9) Maps showing cable franchise serving areas by MSA. Lew Declaration, Exhibit 3.</p> <p>(10) Maps identifying known competitive fiber providers, known competitive fiber and known competitor lit buildings, and competitors competing using special access. Lew Declaration, Exhibits 5, 8; October 10, 2007 Letter from Joseph Jackson to Marlene Dortch, Attachment H.</p>